

Kris Stein, Ranger, Wallowa Ranger District  
Sitka Pence, Wallowa Ranger District  
Submitted via E-Mail

February 27, 2017

**Re: Proposed Lostine Corridor Logging Project**

Dear Ranger Stein:

I respectfully submit these comments on the proposal to log 2,000 acres within the Lostine River Corridor, a narrow, 12-mile long strip of undesignated land enclosed on both sides by the Eagle Cap Wilderness. The Eagle Cap is Oregon's largest designated wilderness and the Lostine is also a designated National Wild and Scenic River, testimony to how special this spectacular place is. Since the 1970's, I have camped in all three of the Corridor's campgrounds and hiked many times on all five of the trails accessed by the Corridor. Thank you for the opportunity to comment.

**A Categorical Exclusion is Not Adequate for the Proposed Project**

A very important consideration is that the Forest Service is not *required* to do a Categorical Exclusion under NEPA for this project, even though it *may* have that option under certain interpretations of law. The public concern over this project alone indicates that a CE is inadequate. If you choose to proceed, anything less than a full EIS would be disingenuous and likely illegal, regardless of what options you believe are available.

Further, the CFR's regarding NEPA state directly that a CE is inadequate when endangered species could be affected by a proposed action. Given that this is the case with listed Spring/Summer Chinook Salmon that find critical habitat in the Lostine River, it would be irresponsible, and possibly illegal to prepare only a CE.

Doing a full EIS, whether you feel it is required or not, would show that the Forest Service respects the sensitivity of salmon and other rare and unique plant and animal species found in the Corridor, as well as quality recreation opportunities. It will ensure that no damage is done to critical habitat regardless of other analysis options that may exist.

**The Lostine River Road is a Very Unique Recreation Corridor**

When the Oregon Wilderness Bill was being debated in 1984, I spoke with then-Eagle Cap District Ranger Bob Casey about the wilderness boundary for the Eagle Cap. We discussed the opportunity to move the boundary to directly abut the Lostine River Road on the east side of the Corridor. Casey generally supported expanding the boundary, but said he'd like to have options for new or improved campgrounds and trailheads and thus would prefer keeping it further back from the road. I recall him saying to the effect: "We'd never do any logging in the Lostine, it's a recreation corridor and always will be." Wilderness advocates supported Casey's request, which is why the boundary lies where it does today and not within a few yards of the road. Soon after the bill passed, Jerry Magera and Steve Fletcher, timber staff of the HCNRA, approached Casey with a logging proposal, which Casey rejected.

The Lostine Corridor is unique in the national forest system because it provides a very rare recreation experience. Whether hardy or physically limited, people who wish to drive on a lightly improved road

into the very heart of a relatively large wilderness area are rewarded. The setting campers, anglers, bird-watchers, hikers and all recreationists find is predominantly rustic, wild and natural, not only along the slopes that rise from the flood plain, but in the plain and riparian area itself. It is a place where people are in the midst of wilderness without even getting out of their vehicle. The proposed action will deface the natural character of the viewshed in the Lostine Corridor for years to come.

This project is an example of why many public lands advocates made the Hells Canyon-Chief Joseph National Preserve proposal one of the country's most popular campaigns for a new National Park System unit back in the 1990's. We're still waiting for the Forest Service to show its acumen in protecting the quality of unique recreation experiences. Yet what we repeatedly see is the agency using recreation and recreation users as surrogates for logging.

The Lostine Corridor is a wet forest within a fire-adapted ecosystem. The cliffs enclosing the narrow canyon prevent a profusion of sunlight. It is not a south-slope dry site where fire-cleansed open slopes with widely-spaced trees are found, yet the project appears to be treating it as such. If the danger to the public is as dire as the scoping notice claims, when will we see the edict that all such wet forests with heavy fuels will either be logged, or closed to recreation use?

I would suggest a poll of the regional public be conducted, asking whether people would prefer the small risk of having to be evacuated in the case of a serious wildfire, or resign to recreating amid clearcuts, "temporary" roads, a plethora of stumps and logging slash, and decreased fish and wildlife habitat. I can easily predict what the results would be and I intend to join with other people and organizations concerned to get the word out both locally and regionally about this project so the Forest Service can graphically see where the sentiment lies.

### **Wildlife Concerns**

The proposed action would displace many species of wildlife. For example, pine marten and elk both find important habitat in dense stands of timber. There have always been dense stands of timber in northeast Oregon, although not the profusion that exists today in the post-fire suppression and high-grade logging era. The Lostine Corridor is one place where dense stands in a flood plain should be maintained to complement ridge slope habitat in the wilderness area for species that depend upon them. The Forest Service is engaged in what seems to be a relentless push to thin every dense stand of timber their foresters can find. It is imperative that dense stands that should ***not*** be thinned are identified, and the Lostine Corridor is certainly one of those for the reasons I describe herein.

### **A Wilderness Boundary Survey is Necessary**

Prior to approving any project in the Corridor, the Forest Service must ensure that a full survey of the boundary of the Eagle Cap Wilderness has been completed. It is my understanding that the boundary to the west is the river, but to the east it is not obvious, as no specific landmarks were cited by Congress as marking the boundary. The non-wilderness road corridor is only (roughly) one hundred yards wide in several places.

In 1987, the Forest Service illegally logged part of the Eagle Cap Wilderness near Wing Ridge during a fire salvage operation. That mistake, damaging the irreplaceable legacy of wilderness, cannot be repeated. The Forest Service must establish that its location of the wilderness boundary complies with the intent of Congress when it expanded the Eagle Cap Wilderness in 1972 and again in 1984, and must mark the boundary clearly should the proposed action be implemented.

## **National Wild and Scenic River ORV's Would be Jeopardized**

The Lostine River is designated as a National Wild and Scenic River and the identified outstandingly remarkable values- scenery, recreation, fisheries, wildlife and botany- will undoubtedly be placed in jeopardy by the project. In particular, 11 species of PETS plant species are found in the area. It is very important to note that among the ORV's, recreation is required to be subordinate to the natural values. This casts a pall upon the entire project as it would allegedly enhance recreation use at the expense of the prioritized ORV's.

## **The proffered “Need for Action” Contradicts Scientific Information**

The proposed action is purportedly designed to make the Lostine Corridor safer for recreationists by reducing fuel loading therein. Yet it is obvious none of the forest beyond the Corridor can be thinned because it is within the wilderness area. The contention that the proposed action, with its strictly limited area of treatment, will reduce risks to recreationists is contradicted by a wide body of information accumulated by the Forest Service itself.

Based on my three years of training in fire behavior by the Forest Service, and three seasons on the Memaloose Helitack crew, I urge you to consider the rational scenario should a wildfire of any magnitude threaten the Lostine Corridor: You would evacuate the Corridor regardless of the amount of fuel loading.

Based on the project's limited logic, the safest the Corridor could be made is if you removed all the vegetation on a regular basis. However, I would contend that even that radical action would not prevent an evacuation should a fire threaten it, or result in significantly less danger to the recreating public. The naturally dense forests enclosing the Corridor are conducive to firestorms, wildfires of such magnitude the minimal protection the project would provide would be meaningless within the narrow confines.

The attempt to make the Corridor more fire-resistant, working only within the available space, is an exercise in futility. Moreover, the project emphasizes canopy removal, which is a contradictory objective as this will increase the sunlight exposure to trees and downed material, resulting in dryer, more flammable fuels.

The project is contradicted by so many previous scientifically-based proclamations by the Forest Service, it simply does not stand to reason. I hopefully do not need to provide cites for document after document enabling fuels reduction projects, which rightly insist that for fuels reduction to be effective in reducing the risk of abnormally large wildfires, fuels reduction projects must be undertaken on a landscape basis over vast areas. For that reason alone, this proposed action does not hold up to scientific scrutiny.

Firestorms (wind-driven heat and flame surges) have become almost commonplace due mostly to climate change. If even a mild firestorm were to occur on the slopes above the Corridor, blowing down or upriver, no amount of thinning, or even elimination of all vegetation in the Corridor, would likely save anyone should the fire reach it. There is significant documentation of firestorms tragically killing firefighters and wildlife while they were in areas that were vegetation-free, such as rock slides and clearcuts, when a firestorm passed.

Instead of doing what will have to be done anyway, even if the project as written is completed, namely implementing a simple evacuation plan, the proposed action goes to an outrageous extreme in changing the character and naturalness of the entire Corridor with little or no positive benefits. Even a slow-moving fire would not be significantly affected by the proposed action.

### **The Logical Alternative: A Site-Specific Evacuation Plan**

Let's be honest. How difficult would it really be for the Forest Service to dispatch a tanker from Joseph up the Lostine Corridor to evacuate recreationists in the event a wildfire threatened the Corridor? I would hope that you have not lost all faith in the agency's well-funded firefighting programs or its ability to establish a viable, site-specific evacuation plan. Can you reasonably claim that evacuation would not be necessary if the proposed action is implemented? How far is the Forest Service going to go in this fanatical push allegedly to protect recreation users? Is it going to prevent use of the Lostine Corridor trails during fire season because you cannot reasonably evacuate people from wilderness trails?

In conclusion, I am opposed to the proposed action and urge you to abandon it. If you choose to proceed, an EIS, not an EA or CE, is required. I hereby request that you send me, via e-mail or postal mail, and in a timely manner, a notice of any decision made regarding this proposed action. Thank you again for your consideration.

Sincerely,

Ric Bailey  
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Copies to:

Tom Montoya, Supervisor, WWNF  
Honorable Senator Ron Wyden  
Honorable Senator Jeff Merkley  
Hells Canyon Preservation Council